

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Lindsay Cooper (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION TO
COMPEL WITH RESPECT TO ITS
SECOND SUBPOENA SERVED ON NON-
PARTY ANTHONY LEVANDOWSKI**

I, Patrick Schmidt, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of its Motion to Compel With Respect To Its Second Subpoena Served On Non-Party Anthony Levandowski (the “Motion”), filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Blue highlighted portions	Defendants
Waymo’s Motion	Yellow highlighted portions	Non-Party Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 3	Entire document	Non-Parties Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 4	Entire document	Non-Parties Sandstone, LLC / Ognen Stojanovski / Tyto LiDAR, LLC
Ex. 5	Entire document	Defendants
Ex. 6	Entire document	Defendants
Ex. 7	Entire document	Non-Party Sandstone, LLC
Ex. 8	Yellow highlighted portions	Non-Party Ognen Stojanovski
Ex. 9	Entire document	Non-Party Tyto LiDAR, LLC
Ex. 10	Entire document	Non-Party Tyto LiDAR, LLC
Ex. 12	Entire document	Non-Party Tyto LiDAR, LLC

3. The highlighted portions of Waymo's Motion contains references to information that Defendants and/or Third Parties have designated as confidential and/or highly confidential.

4. Waymo expects Defendants and/or Third Parties to file one or more declarations in accordance with the Local Rules.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Los Angeles, California, on August 4, 2017.

By */s/ Patrick Schmidt*

 Patrick Schmidt
 Attorney for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Patrick Schmidt.

Charles K. Verhoeven